

EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

UNITED STATES OF AMERICA)

)

v.) Case no. 1:14-CR-306-GBL - 8

)

MANUEL E. PAIZ GUEVARA)

MOTION FOR LEAVE TO FILE SUPPLEMENTAL MOTION
FOR CONTINUANCE AND SEVERANCE
UNDER SEAL

COMES NOW, MANUEL E. PAIZ GUEVARA, hereinafter referred to as
defendant and requests leave to file a Supplemental Motion for Continuance and
Severance **UNDERSEAL**.

In support of the motion Movant would allege and prove the following:

1. Defendant has filed a Motion for Continuance and to Sever.
2. That the motivation for the motions is found in Learned Counsel's health issues.
3. That Defendant would desire to file the particulars of the health issues, medical evaluations, available procedures, scheduling issues for the medical procedure and reasonably predictable, reasonably foreseeable recuperative expectations and side effects.

4. That the anticipated or reasonably predictable period during which the side effects of the procedure and the description of the side effects might reveal to the court and record why Learned Counsel would not be able to provide defendant effective assistance of counsel for several months.
5. That the specifics and descriptions of the issues in paragraph 3, above, are indelicate and private, but necessary to the court and the record in assessing the requirement for continuance or, in the alternative, continuance and severance and the balancing calculus between the rights of the defendant, judicial economy and inconvenience to the United States.
6. That the rights of the defendant must supersede any issues of privacy or embarrassment of Learned Counsel.
7. Learned Counsel would feel more comfortable in accurately describing the available treatments and side effects, including the expected duration of such side effects if permitted to file **UNDER SEAL**.
8. That the specifics compelling the request for continuance or, in the alternative, continuance and severance would be necessary for appellate review.

WHEREFORE, premises considered, defendant moves for leave to file a Supplemental Motion for Continuance and Severance **UNDER SEAL**.

Respectfully submitted,

MANUEL ERNESTO PAIZ GUEVARA

By: _____(s)_____

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CERTIFICATE OF SERVICE

THE UNDERSIGNED CERTIFIES that on February 1, 2016, a copy of the above and foregoing was delivered to the Clerk of the Court using the CM/ECF system, which sends notification of such filing (NEF) to the following:

Stephan M. Campbell, Esq.
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And to counsel for all co-defendants in this matter.

_____/s_____
David P. Baugh
Counsel for Defendant
MANUEL E. PAIZ-GUEVARA